

# **Training Requirements for Spill Prevention Control and Countermeasures (SPCC) 40 CFR Part 112**

## **Naval Air Station Corpus Christi Texas**

*CY 2014*

# BOTTOM LINE UP FRONT



**To prevent oil discharges from reaching navigable waters of the U.S. or its adjoining shorelines**

# Required Training as Specified in 40 CFR Part 112



- **All personnel who handle oil products must at a minimum be trained in:**
  - **Operation and maintenance of equipment to prevent spills**
  - **Spill response procedures**
  - **General facility operations**
  - **Applicable pollution control laws, rules, and regulations**
  - **And the contents of the site specific SPCC Plan**
  
- **An individual must be designated and trained at each facility who is to be accountable for discharge prevention and who reports to facility management**
  
- **Spill prevention briefings must be held annually and must at a minimum include:**
  - **Any past spills, discharges, or failures of the plan or equipment**

# SPCC Training Requirements



- **Training is required annually to ensure proper actions are taken in the event of a spill**
- **Training is also required for new employees assigned to oil handling, maintenance or spill response duties**
- **Training updates be conducted whenever a significant change has been made to any oil storage (e.g., new tank installation)**

# Who is Trained on the SPCC Plan?



- **EPA indicted in a regulatory preamble "oil-handling personnel" are employees engaged in one or more of at least the following functions:**
  - 1. **Operation and maintenance of oil storage containers (includes storage drums, tanks and oil-filled equipment);**
  - 2. **Operation of equipment related to storage containers; and**
  - 3. **Emergency response personnel.**
- **ANY employee working at Naval Air Station Corpus Christi involved in oil handling, transfer, storage, spill response, or maintenance of oil filled equipment.**
- **Fuel oil delivery employees responsible for fueling tanks and equipment on NAS Corpus Christi.**

# What is the SPCC Plan?



- **SPCC Stands for Spill Prevention, Control, and Countermeasures Plan.**
- **The Naval Air Station Corpus Christi SPCC Plan is kept on file at the Public Works Environmental office building 19;**
- **As well as,**  
**[http://www.cnic.navy.mil/regions/cnrse/installations/nas\\_corpus\\_christi/om/environmental\\_support/spcc.html](http://www.cnic.navy.mil/regions/cnrse/installations/nas_corpus_christi/om/environmental_support/spcc.html)**

# Goals of SPCC Training



- **Familiarize employees with the written SPCC Plan**
- **Identify oil storage locations and handling procedures**
- **Identify spill pathways**
- **Familiarize employees with appropriate spill response procedures and use of response equipment**

# Main Elements of the SPCC Plan



- **Operating Procedures implemented to prevent oil spills.**
  - **Examples: Routine inspections, SPCC On-Site Coordinator observing tank filling procedures.**
- **Control Measures installed to prevent oil from reaching navigable waters.**
  - **Example: Secondary containment.**
- **Countermeasures to contain, cleanup, and mitigate the effects of an oil spill.**
  - **Examples: Cleanup and spill equipment availability on site, available list of contacts and phone numbers for employee use during spills.**

# SPCC Program Goals



- **Spill Prevention**

- Installation of proper equipment, repair of malfunctioning systems, inspections, and good fueling and handling practices

- **Spill Control**

- Monitoring of leak detection, proper reporting, inspection of containment and piping systems.

- **Spill Countermeasures**

- Quick, proper, and safe response to spills.

# Potential Spill Pathways



- In some areas, oil can enter the “Navigable Waters of the U.S. or adjoining shorelines” by:
  - Direct spillage into a storm drain.
  - Direct spillage to any associated wetlands areas that lead to Corpus Christi Bay, Oso Bay, and Laguna Madre.
- Never allow oil to drain into an open drain or into a ditch or waterway.
- Oil containing equipment (i.e. a vehicle) is never to be rinsed or washed near a storm drain or waterway.

# Original SPCC Plan Prevention Regulation



- **Authority was granted under the Clean Water Act (CWA) 311 and 501, and is codified under 40 CFR 112.**

# Why Do Facilities Need an SPCC Plan?



- **The Facility has aggregate above ground oil storage capacity of more than 1,320 gallons; and**
- **Oil can be reasonably expected to enter into navigable waters of the U.S. by storm drains, ditches, overland flow or other means into navigable waterways.**

- **Routine Inspections**

- **SPCC plan includes the frequency schedule and checklist necessary for your inspection.**
- **Ensure that necessary maintenance and repairs are completed as scheduled and recorded.**
- **SPCC specific inspections are conducted on a Weekly, Monthly, Quarterly, and Annually basis as outlined in the Periodic Inspection Checklist.**
- **Inspection records must be kept for a minimum of three years**

# SPCC Plan Certification and Review



- **For facilities with 10,000 gallons or more above ground oil storage capacity, the SPCC Plan must be reviewed and certified by a Professional Engineer (PE) to be in accordance with good engineering practices, including the consideration of applicable industry standards and the requirements outlined in 40 CFR 112.**
- **The Plan must be reviewed and certified every five years.**
- **Any technical amendments to the Plan must be certified by a PE.**

# Containers Subject to SPCC Regulation



- **Any current oil storage container 55 gallons or greater**
  - **This includes fuel tanks, drums, used oil, collection stations, cooking oil containers, hydraulic elevator reservoirs, etc**

# Types of Oil Which May Be Regulated Under the SPCC



- **All petroleum based oils.**
  - **Fuel Oil, Gasoline, Hydraulic Fluid, Motor Oil, etc.**
- **Animal fats and oils.**
- **Transformer oil**

# Oil Storage at the Naval Air Station Corpus Christi TX



- **Oil Storage at the Naval Air Station Corpus Christi includes;**
  - **Aboveground Storage Tanks (ATS)**
  - **Underground Storage Tanks (UTS)**
  - **Hydraulic Elevator Systems and Reservoirs**
  - **Electrical Transformers**
  - **Electrical Switches**
  - **Waste/Used Oil Collection Stations**
  - **Used Cooking Oil**
  - **55 Gallon Drums in various locations**
  - **Portable Generators and Support Equipment**
  - **Fuel trucks**

# Types of containers

- **There are two types of containers subject to SPCC rules:**
- **Bulk containers—drums, tanks; used for the storage of oil and oil products**
  - **Requires secondary containment**
- **Active containers—transformers, elevator tanks**
  - **Active containers do NOT have to meet the secondary containment requirements of section 112.8(c)**
  - **Active containers still require inspection**

- **Fuel Deliveries**

- **Tank Truck Drivers loading or unloading materials on Naval Air Station property shall adhere to the following:**

- Remain with vehicle at ALL Times while loading or unloading.
    - Drain lines to storage tanks and close the drain valves before disconnecting and ensure that appropriate containment is located beneath connections.
    - Inspect vehicle prior to departure to ensure that all lines are disconnected and all drains and vents are closed
    - Immediately report all spillage to Environmental personnel

- **Alarms / Shutoff Valves**

- **Monitor activity of leak detection / overfill protection systems and respond immediately to alarms.**
- **DO NOT assume alarms are false, even if repeatedly activated.**
- **DO NOT leave fueling station unsupervised during loading operations.**
- **Perform regular tests on monitoring systems to ensure operational capabilities.**

# Secondary Containment



- **Definition of proper containment**
  - **All bulk storage containers of oil must be located in containment sufficient for the entire capacity of the largest container and sufficient have sufficient freeboard to contain an additional 10% volume.**
  - **Secondary containment must be impervious material**
  - **Secondary containment is NOT required for Qualified Oil-Filled Operational Equipment such as transformers or electrical switches currently in use.**

# Secondary Containment



- **Routine Inspection**

- Can be performed by any SPCC On-site Coordinator.
- Check for indication of oil leaks on floors, pallets, dikes, retaining walls, and berms.
- Water must be able to drain out **ONLY** if there is no noticeable sheen.
- Refer to your site specific SPCC plan for specific details regarding your site's secondary containment inspection.

- **Discovery of Release**

- **Extinguish or remove any source of ignition.**
- **Identify the material and its point of release.**
- **Notify the Fire Department 911 and Navy Environmental immediately.**
  - **Potential threat to human health and the environment.**
- **Attempt to stop the release at its source if it is safe to do so.**
- **Initiate the spill reporting procedure as specified in the SPCC plan.**
- **Reference the Safety Data Sheet (SDS) for the spilled substance.**

- **Containment of Release**

- Attempt to stop the release at the source
- Contain material to prevent release into the environment
- Recover or clean up spilled material
- Arrange for disposal of waste materials through Environmental HWCB
- The Navy Environmental department is responsible for reporting to outside agencies.

# Spill Reporting Information



- **Spill Reporting:**
  - **Refer to SPCC reporting procedures.**
  - **Oil discharged to water:**
    - Any release of oil to water must be reported to the Navy Environmental office as soon as the person has knowledge of the discharge.
  - **Oil discharged to land:**
    - Any release of oil must be reported to the Navy Environmental office as soon as the person has knowledge of the discharge.
  - **Oil discharged to secondary containment areas:**
    - Any release of oil must be documented and cleaned up as soon as the person has knowledge of the discharge.

# Spill Reporting



- **Documentation**

- **The SPCC On-Site Coordinator will relay to Environmental any reports of spills and include the following information:**

- Date, time, and duration of release
    - Type of incident
    - Material involved
    - Volume of material involved
    - SPCC Plan Discrepancies
    - Actions taken to avoid future incidents

# After a Spill



- **Be sure to include information on the spill report for the following:**
  - How to prevent another occurrence
  - Effectiveness of the response
- **Remember to restock your spill kit with any items used and/or add items that may be useful in the future.**

# Notifications - Internal



- **Contact Navy Fire Department Emergency Line**

**@ 911**

**whenever there is a spill, or threat of a spill, to public health, fire, or explosion involving oil (*or other hazardous material*)**

- **Contact Navy Environmental Office**

**@ 961-3776/5356**

**whenever there is a spill, or threat of a spill, that enter, or threaten to enter, the environment, storm/floor drains, and coastal waters involving oil (*or other hazardous material*)**

# Fueling Operations



- **No smoking is permitted during fueling operations**
- **The delivery driver must remain with the vehicle at all times during the fueling operation.**
- **The delivery driver will insure that the vehicle is properly positioned and that drip pans or absorbent pads are beneath all fuel line connections.**
- **The delivery driver will have proper spill control supplies (booms, pads, etc.), a list of contact numbers, and a working cell phone.**

- **Regulated containers are to be located inside access controlled areas, or gated and locked areas accessible to authorized personnel.**
- **Lighting must be sufficient to enable the visualization of spills or leaks during hours of darkness and to detour releases from occurring through acts of vandalism.**

# Common SPCC Violations



- **Inadequate Secondary Containment**
  - Containment is either nonexistent, porous, or incapable of containing a spill due to improper size.
- **Fueling procedures not properly followed**
  - Procedure is not properly observed, spill equipment is not readily available, etc.
- **Training and inspection records not properly documented or filed**
- **Security fencing and/or lighting not present where applicable**
  - Gates are left unlocked, lighting is not maintained



Questions?